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10 Attorneys for Defendant  
11 AMAZON.COM SERVICES LLC

12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA

14 ESTEFANIA CORREA RESTREPO,  
15 Plaintiff,  
16 v.  
17 AMAZON.COM SERVICES LLC; DOES I-X,  
18 Defendant.

Case No. 2:25-cv-00119-RFB-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND ALL DEADLINES  
(FIRST REQUEST)**

19  
20 Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendant AMAZON.COM  
21 SERVICES LLC (“Defendant”) and Plaintiff ESTEFANIA CORREA RESTREPO (“Plaintiff”)  
22 (collectively, the “Parties”) stipulate to amend the Discovery Plan and Scheduling Order (ECF  
23 No. 9) by extending all deadlines for a period of ninety (90) days.

24 This is the first request to extend all deadlines and Scheduling Order in this matter. The  
25 requested extension is sought in good faith and not for purposes of undue delay. This request is  
26 submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

27 **DISCOVERY COMPLETED**

28 The parties have each exchanged their initial disclosures and propounded written discovery.

**DISCOVERY REMAINING TO BE COMPLETED**

Conduct depositions. Propound additional discovery following depositions.

**REASONS FOR REQUESTED EXTENSION**

The parties participated in an ENE on July 1, 2025. The extension is necessary for the parties have ample time to complete all appropriate discovery following the ENE.

**PROPOSED REVISED DISCOVERY PLAN**

**1. Discovery Cut-Off Date:**

The Parties' current deadline for completing discovery is **July 23, 2025**. The Parties request that the Court extend that deadline to **October 21, 2025**.

**2. Dispositive Motions:**

The Parties' current deadline to file dispositive motions is **August 22, 2025**. The Parties request that the Court extend that deadline to **November 20, 2025**.

**3. Pretrial Order:**

The Parties' current deadline for filing the Joint Pretrial Order is **September 22, 2025**. The Parties request that the Court extend that deadline to **December 22, 2025**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

**4. Fed. R. Civ. P. 26(a)(3) Disclosures:**

The Parties' current deadline for disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto with the Pretrial Order pursuant to LR 26-1(b)(6) in the Joint Pretrial Order is September 22, 2025. The Parties request that the Court extend that deadline to **December 22, 2025**.

**5. Extensions or Modifications of the Discovery Plan and Scheduling Order:**

In accordance with Local Rule 26-3, a stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty (21) days before the expiration of the subject deadline.

The Parties make this stipulation in good faith and not for the purposes of undue burden or delay.

1 Dated: July 2, 2025

Dated: July 2, 2025

2 /s/ Ruthann Devereaux-Gonzalez

/s/ Amanda Breemes

3 Leon Greenberg, Esq.

Z. Kathryn Branson, Esq.

Ruthann Devereaux-Gonzalez, Esq.

Amanda Breemes (*Admitted Pro Hac*)

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AMAZON.COM SERVICES LLC

6 /s/ Ruthann Devereaux-Gonzalez

James P. Kemp, Esq.

7 KEMP & KEMP, ATTORNEYS AT LAW

8 *Attorneys for Plaintiff*

ESTEFANIA CORREA RESTREPO

10 **IT IS SO ORDERED.**

11 Dated: July 3, 2025

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13 \_\_\_\_\_  
14 UNITED STATES MAGISTRATE JUDGE